

Exhibit F

Giddings, Peter CONFIDENTIAL MATERIAL SUBJECT TO PROTECTIVE ORDER July 20, 2006
Washington, DC

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

ORIGINAL

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SMITH KLINE & FRENCH : THIS DEPOSITION
LABORATORIES LIMITED and : TRANSCRIPT CONTAINS
SMITHKLINE BEECHAM CORPORATION : CONFIDENTIAL MATERIAL
d/b/a GLAXOSMITHKLINE, : THAT IS SUBJECT
: TO PROTECTIVE ORDER
Plaintiffs, :
v. : Civil Action No. 05-197
TEVA PHARMACEUTICALS USA, INC., :
Defendant. : Thursday, July 20, 2006
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Videotaped Deposition of PETER GIDDINGS, a witness
herein, called for examination by counsel for
Defendant in the above-entitled matter, pursuant to
notice and agreement of counsel, commencing at 9:56
a.m., at Wilmer Cutler Pickering Hale & Dorr, LLP,
1875 Pennsylvania Avenue, N.W., Washington, D.C.,
before RYAN C. JACKSON, CSR, Notary Public in and for
the District of Columbia, when were present on behalf
of the respective parties:

Henderson Legal Services, Inc.
(202) 220-4158

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1 A I don't recall precisely when.

2 Q Can you give me an estimate?

3 A Well, it was -- I first heard soon after
4 the ANDA notice was filed.

5 Q Are you currently employed by
6 GlaxoSmithKline?

7 A I am.

8 Q And what is your title there?

9 A Head of Patent Administration and
10 Information in the Corporate Intellectual Property
11 Department.

12 Q And what are your duties as Head of Patent
13 Administration?

14 A I'm responsible with respect to patent
15 administration for the paralegal staff who take care
16 of all the formalities associated with patent filings
17 around the world and also with data management on our
18 patent applications, for example, to ensure that fees
19 are paid, actions are taken and so on.

20 With respect to information, I'm
21 responsible for a group of U.K. based information
22 scientists who do some searching work for the

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1 **department.**

2 In addition, I'm also responsible for
3 managing departmental budgets and expenditures, as
4 well. And I also have a small portfolio of patent
5 work but it's -- it is relatively small compared to
6 other attorneys in the department.

7 Q When you say you have a small portfolio of
8 patent work, what do you mean by "patent work"?

9 **A Responsibility for certain patent**
10 **applications that have been filed and a small area of**
11 **research where new patent applications may be filed**
12 **in the future.**

13 Q So would it be fair to say, then, that the
14 patent work that you're responsible for includes
15 drafting patent applications?

16 **A Yes.**

17 Q And would it also include prosecution of
18 those patent applications with various international
19 patent offices?

20 **A It does.**

21 Q And does it also include determining
22 whether a patent application should be filed --

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1 A No, I don't.

2 Q Earlier Ms. Wigmore commented that you're
3 an attorney. Are you registered with some Bar
4 organization?

5 A Not with a Bar organization, but I have two
6 qualifications, two legal qualifications.

7 Q And what are those?

8 A As a U.K. Chartered Patent Agent and a
9 European Patent Attorney.

10 Q And did you have -- when did you get those
11 two legal qualifications?

12 A I got the U.K. qualification in 1985 and
13 the European qualification in 1986.

14 Q Prior to getting those two legal
15 qualifications, were you employed by GlaxoSmithKline?

16 A At the time -- at the time of those
17 qualifications, I was employed by a predecessor
18 company of GlaxoSmithKline.

19 Q Which was?

20 A Which was Smith Kline & French
21 Laboratories, Limited, which was the U.K. part of
22 Smith Kline Beckman Corporation.

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1 **A I'm sorry, just one moment. Okay.**

2 **Q**You understand that the '808 patent and the
3 '860 patent are the two that I'm referring to when I
4 refer to the patents-in-suit?

5 **A Yes.**

6 **Q**With respect to the prosecution of the '808
7 patent, did you have any involvement in that?

8 **A Can I clarify that you are referring to the**
9 **U.S. '808 patent?**

10 **Q**That's right.

11 **A Yes. No, I did not.**

12 **Q**And with respect to the U.S. '860 patent --

13 **A My role with respect to this patent was**
14 **to -- I was responsible for drafting the U.K.**
15 **priority application on which this application is**
16 **based.**

17 **Q**When you say you were responsible for
18 drafting the U.K. priority application for the U.S.
19 '860 patent, were you the only person responsible for
20 drafting that priority application?

21 **A I don't -- I don't recall specifically -- I**
22 **don't recall in detail, but I do -- I do recall that**

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1 inventorship, I would have made an investigation, but
2 I don't remember doing so as I am here today.

3 BY MR. BRAHMA:

4 Q And because it was your responsibility, no
5 one else would have done it, correct?

6 MS. WIGMORE: Objection.

7 THE WITNESS: With respect to this
8 application, that's correct.

9 BY MR. BRAHMA:

10 Q You said that -- well, correct me if I'm
11 wrong, but my understanding is that you previously
12 testified that for the applications that you were
13 responsible for, when you made a designation of
14 inventorship, you would make an investigation into
15 the inventorship; is that accurate, typically?

16 A Yes.

17 Q What type of investigation would you do to
18 determine the proper inventorship of an application?

19 MS. WIGMORE: And you may answer based on
20 your general custom and practice. You may not in the
21 course of your answer reveal the substance of any
22 attorney-client communications to the extent you

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1 remember any.

2 THE WITNESS: As a general practice, I
3 would talk to the people who provided me the
4 information relating to the invention in the first
5 instance and I would ask them to provide me with
6 details of what they thought their involvement
7 comprised and then also ask them to tell me of any
8 other people who were involved with the work, as
9 well; and then I would talk to those people to see --
10 to get their view, as well, and from that information
11 I'd make a designation of inventorship.

12 BY MR. BRAHMA:

13 Q And what is the standard for inventorship
14 in the U.K.?

15 MS. WIGMORE: Objection, calls for a legal
16 conclusion. You can give your understanding.

17 THE WITNESS: Well, the standard that we
18 work to is to try and name the people who were
19 actually involved with coming up with the invention.

20 BY MR. BRAHMA:

21 Q And when you say, "involved with coming up
22 with the invention," what do you mean?

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1 BY MR. BRAHMA:

2 Q Can you describe for me your typical
3 process for drafting a patent application.

4 MS. WIGMORE: Again, you may testify about
5 your general practice, but you may not in the course
6 of your answer reveal the substance of any
7 attorney-client communications.

8 THE WITNESS: Yes, from a general practice,
9 perspective, usually the first point would be
10 somebody from R&D would come to me with some
11 information that they would like to discuss whether
12 or not that's patent -- it is patentable, and we
13 would look at what information they have and
14 discuss -- discuss putting together a claim a patent
15 claim for the invention bearing in mind any prior art
16 that may be out there affecting the invention and
17 also looking at what might be a reasonable prediction
18 for a generic claim based on the information that we
19 have.

20 And from the claim, my practice was then to
21 turn to drafting a description of the patent
22 application, which is basically the description of

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1 how to make and use the claimed invention; and at
2 that point I would need from the usually scientists
3 detailed information as to the specific examples of
4 the application, data and so on.

5 And then I would arrive at a draft patent
6 application, and then I would have the people in R&D
7 who have provided me the information review the
8 application and be comfortable that everything that
9 I've said is correct and complete.

10 BY MR. BRAHMA:

11 Q So let me try and break that down into the
12 individual steps. You said first that someone from
13 R&D typically comes to you with a proposed invention
14 to patent; is that accurate?

15 A **Well, they come with information which they
16 think might be an invention that is patentable.**

17 Q And you advise them as to whether it's
18 patentable or not?

19 MS. WIGMORE: I just want to be clear, and
20 if you'll give me a standing instruction, I'd
21 appreciate it that he is allowed to talk about
22 general practice but that these answers do not reveal

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1 attorney-client communication and will not be
2 construed in any way as a waiver.

3 MR. BRAHMA: Actually, it would be helpful
4 to me if you could make that instruction
5 individually.

6 MS. WIGMORE: Okay. Then that instruction
7 applies to this question.

8 THE WITNESS: I'm sorry, could you repeat
9 the question please.

10 MR. BRAHMA: Could you please reread the
11 question.

12 (The reporter read the record as
13 requested)

14 MS. WIGMORE: Same instruction.

15 THE WITNESS: Yes, that's part of my role.

16 BY MR. BRAHMA:

17 Q And then the next step is to develop what
18 you called a generic claim in light of the prior art?

19 A Yes.

20 MS. WIGMORE: Same objection.

21 BY MR. BRAHMA:

22 Q Can you tell me what you mean by "a generic

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1 claim."

2 A Yes. Normally when the scientists come to
3 us they have a specific example or specific examples
4 of work, and it is my job as a patent attorney to
5 look at what they have and see if we can -- see if
6 from that we can create a general -- a general
7 formula that covers -- that covers the really the
8 invention that they have so there may be a number --
9 so they have a number of individual examples within
10 that can be encompassed within a broad -- sorry, not
11 necessarily a broad but in the generic formula that
12 protects really the invention, if you like, or the
13 idea that they have which is embodied in those
14 individual examples.

15 Q And if we could use the '860 patent as an
16 example, is there a generic claim in that patent?

17 MS. WIGMORE: And, again, I'm going to
18 instruct you not to reveal the substance of any
19 privileged communications you may recall about that
20 patent application process, but you can answer
21 otherwise if you can.

22 THE WITNESS: Do you want me to look at the

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1 '860 patent?

2 BY MR. BRAHMA:

3 Q The '860 patent that has previously been
4 marked as Exhibit 17.

5 MS. WIGMORE: So the question is does that
6 patent encompass a generic claim?

7 BY MR. BRAHMA:

8 Q Yes, does the '860 patent have a generic
9 claim as you've used that term?

10 MS. WIGMORE: You may answer that question.

11 THE WITNESS: Yes, it does. Claim 1 is a
12 generic claim.

13 BY MR. BRAHMA:

14 Q So under the typical process, that generic
15 claim would be something that you came up with; is
16 that correct?

17 MS. WIGMORE: And again, in your answer you
18 may reveal -- you may discuss your typical practice,
19 but if you have any recollection of the specific
20 process by which you drafted Claim 1, I instruct you
21 not to reveal the substance of any attorney-client
22 communications about that.

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1 THE WITNESS: With respect to this specific
2 claim, I don't recall how I have that claim -- how
3 that claim was arrived at.

4 As a matter of general practice, it's
5 something I do in discussion with the people involved
6 with the invention. So it's a -- it's a joint
7 discussion about the generic scope.

8 BY MR. BRAHMA:

9 Q But with respect to this specific claim,
10 Claim 1 of the '860 patent, you don't remember
11 whether or how that generic claim was arrived at; is
12 that correct?

13 MS. WIGMORE: And again, to the extent you
14 recall any substantive communications, I instruct you
15 not to reveal them. You may answer whether you
16 remember or not.

17 THE WITNESS: I don't remember.

18 BY MR. BRAHMA:

19 Q So you also wouldn't remember whether Dr.
20 Owen came up with that generic claim; is that
21 correct?

22 MS. WIGMORE: Same instruction. You can

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1 answer whether you remember anything about how that
2 claim was arrived at.

3 THE WITNESS: No, I don't remember.

4 BY MR. BRAHMA:

5 Q Is the generic claim typically broader than
6 the idea that the person from R&D who initially
7 approaches you has come up with?

8 MS. WIGMORE: Object to the form of the
9 question. I also instruct you not to reveal the
10 substance of any attorney-client communications in
11 your answer, but you can answer.

12 THE WITNESS: I don't think it's -- it's
13 not correct to say that it's broader. It necessarily
14 encompasses more than the specific examples that you
15 have been given but its intent is to cover the
16 concept of the invention, which, rather than saying
17 it's broader than the invention -- or it's not
18 correct to say it's broader than the invention.

19 The invention is the generic claim, and
20 it's defined and it's supported by the specific
21 embodiment -- the specific examples that you have.
22 So it's -- it's -- it's often not -- to say it's one

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1 invention, it's not broadening the invention.

2 BY MR. BRAHMA:

3 Q But is it correct to say, then, that the
4 person from R&D who initially comes to you with this
5 specific example doesn't necessarily have to have
6 envisioned the broader generic claim prior to coming
7 to you?

8 MS. WIGMORE: I'm going to object to that
9 question. I think it's fine for the witness to
10 testify about general practice, but your questions
11 are going to specifics and calling for I think a
12 specific attorney-client advice which I'm going to
13 instruct him he may not provide.

14 I don't know that there's any situation
15 where that's happened, but he can only testify about
16 general practice. I'm not going to allow him to
17 reveal any attorney-client communications.

18 THE WITNESS: I think it would depend is
19 the answer.

20 BY MR. BRAHMA:

21 Q What would it depend on?

22 MS. WIGMORE: Same objection.

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1 Q So as far as you know or as far as you
2 remember sitting here today, you may have been the
3 one to come up with the generic claim that's Claim 1
4 of the '860 patent?

5 MS. WIGMORE: Objection.

6 BY MR. BRAHMA:

7 Q Is that correct?

8 A No, I don't remember. I don't remember how
9 the claim arose.

10 Q So based on your recollection sitting here
11 today, you can't say that you were not the inventor
12 of the generic claim that is Claim 1 of the '860
13 patent, correct?

14 MS. WIGMORE: Objection. And I instruct
15 you not to reveal the substance of any
16 attorney-client communications in your answer if you
17 recall any.

18 THE WITNESS: I have no belief that I was
19 the inventor of that claim.

20 BY MR. BRAHMA:

21 Q And what is the basis for your belief that
22 you were not the inventor of that claim?

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1 Q Well, let me rephrase it. Can you tell me
2 what your basis is for your belief that Dr. Owen is
3 the proper inventor of the claims of the '860 patent?

4 MS. WIGMORE: And I'm going to instruct you
5 if your answer requires you to reveal any
6 attorney-client privileged communications not to do
7 so. If you have any non-privileged information
8 that's responsive to that answer, you may provide it.

9 THE WITNESS: Well, I don't recall the
10 investigation as to inventorship, but my routine
11 practice which I described to you, I have no reason
12 not to believe I didn't do that on this case and come
13 to the decision on inventorship based on that sort of
14 practice.

15 BY MR. BRAHMA:

16 Q So your only basis for believing that Dr.
17 Owen is the proper inventor of the claims of the '860
18 patent is your belief that you've followed your
19 general practice in preparing patent applications; is
20 that correct?

21 MS. WIGMORE: I need to go off the record
22 and consult on a privilege issue before he answers

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1 A I don't recall.

2 Q Do you know if Dr. Owen ever reviewed the
3 U.K. priority application for the '860 patent before
4 it was filed?

5 MS. WIGMORE: I'm just going to caution you
6 in your answer not to reveal the substance of any
7 attorney-client communication, but you may answer.

8 THE WITNESS: I don't recall.

9 BY MR. BRAHMA:

10 Q Is there anyone else that you think would
11 be able to recall that information?

12 MS. WIGMORE: Objection.

13 THE WITNESS: Not within the -- not within
14 the Patent Department.

15 BY MR. BRAHMA:

16 Q Is there someone outside of the Patent
17 Department that you think would be able to recall
18 that information?

19 MS. WIGMORE: Objection.

20 THE WITNESS: Well, I don't know.

21 BY MR. BRAHMA:

22 Q So, as far as you know sitting here today,

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1 Dr. Owen didn't review the patent -- the U.K.
2 priority application before it was submitted to the
3 U.K. Patent Office; is that accurate?

4 MS. WIGMORE: Objection.

5 THE WITNESS: No, I didn't say that. I
6 said I didn't recall doing it.

7 BY MR. BRAHMA:

8 Q So you don't know whether he reviewed it or
9 not, correct?

10 A I don't remember but it's very likely that
11 he did because of his involvement with the patent
12 application. I just don't remember doing it.

13 Q And is that part of your standard process
14 or general practice to have the inventor review the
15 application before it's filed?

16 A Yes, that's right.

17 Q And when you in your general practice send
18 the application to the inventor to review before it's
19 filed, do you do that in written form, some written
20 communication?

21 MS. WIGMORE: You may answer if you have a
22 general practice, but I instruct you not to reveal

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1 the substance of any attorney-client communications
2 to the extent you recall.

3 THE WITNESS: I think that would be in
4 written form, yes.

5 BY MR. BRAHMA:

6 Q But you don't have any specific
7 recollection of whether the application was ever --
8 the U.K. priority application, excuse me, was ever
9 transmitted to Dr. Owen prior to its filing, correct?

10 A **I don't remember, that's correct.**

11 Q What about the U.S. application for the
12 '860 patent, do you have any recollection of whether
13 Dr. Owen reviewed the application for the U.S. '860
14 patent before that was filed with the U.S. Patent
15 Office?

16 MS. WIGMORE: Objection, lack of
17 foundation.

18 THE WITNESS: Well, I don't have a specific
19 recollection but the -- if I remember correctly, the
20 declaration and assignment form that is signed by the
21 inventor was attached to a copy of the application as
22 was to be filed; and, so, I think in that respect he

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1 would have seen the specification before it was
2 filed.

3 BY MR. BRAHMA:

4 Q With respect to the U.K. application, do
5 you have any similar indication or similar basis to
6 believe that Dr. Owen reviewed the application before
7 it was filed?

8 MS. WIGMORE: Objection.

9 THE WITNESS: There's not a formal document
10 that he would sign in the same way, just my normal
11 practice that I would send the specification for
12 review before I filed it.

13 BY MR. BRAHMA:

14 Q Earlier you mentioned that the U.K.
15 priority application was abandoned; is that correct?

16 MS. WIGMORE: Can you repeat that. I just
17 didn't hear that.

18 BY MR. BRAHMA:

19 Q I'll rephrase the question.

20 Was the U.K. priority application for the
21 '860 patent abandoned?

22 A Yes, it was.

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1 Q And why was it abandoned?

2 A Routine practice at the time was to file a
3 European patent application covering amongst other
4 countries the U.K., and we would do that around about
5 the anniversary of 12 months from the initial filing
6 and then allow the U.K. case to be abandoned. So the
7 U.K. would be covered by the European patent.

8 Q And were you involved in the prosecution
9 the European patent?

10 A Yes, I was.

11 Q And what was your involvement?

12 MS. WIGMORE: You can describe generally.
13 I instruct you in your answer not to reveal the
14 substance of any attorney-client communication, but
15 you can answer generally.

16 THE WITNESS: Well, I was responsible for
17 prosecuting the application for responding to any
18 office actions and seeing the application through to
19 grant.

20 BY MR. BRAHMA:

21 Q But with respect to the U.S. prosecution
22 for the '860 patent, did you have any specific

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1 involvement in that U.S. prosecution?

2 MS. WIGMORE: Objection.

3 THE WITNESS: The U.S. application and the
4 filing and responsibility for prosecution of the U.S.
5 application primarily was with a U.S. attorney of the
6 Upper Marion department.

7 BY MR. BRAHMA:

8 Q Did you communicate with the U.S. attorneys
9 that were handling the U.S. prosecution?

10 MS. WIGMORE: You can answer that question
11 yes, no, or I don't recall, but do not reveal the
12 substance of any communications.

13 THE WITNESS: I don't recall those
14 communications but I'm sure they happened.

15 BY MR. BRAHMA:

16 Q Did you transmit to the U.S. attorneys who
17 were handling the U.S. prosecution the application to
18 be filed?

19 A Yes, I did.

20 Q Did you tell the U.S. attorneys who were
21 handling the prosecution of the '860 patent about the
22 prior art that you were aware of?

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1 second paragraph, first five lines, is that
2 information about bromocriptine accurate to the best
3 of your knowledge?

4 MS. WIGMORE: Objection.

5 THE WITNESS: Well, to the best of my
6 knowledge. I have nothing to the contrary.

7 BY MR. BRAHMA:

8 Q Let me also direct you to the -- strike
9 that. Let me direct you to the '860 patent itself,
10 Exhibit 17, that was previously handed to you.

11 A Yes.

12 Q If you could look at column 1, the
13 paragraph starting at line 36.

14 A Yes.

15 Q Do you see where it says, "An alternative
16 form of therapy is to administer postsynaptic
17 dopamine agonists, for example ergot alkaloids such
18 as bromocriptine"? Do you see that?

19 A Yes.

20 Q The characterization there of ergot
21 alkaloids like bromocriptine as postsynaptic dopamine
22 agonists, does that contradict the portion of the

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1 DeMarinis article that we were just looking at?

2 MS. WIGMORE: Objection.

3 THE WITNESS: Well, the sentence in the
4 DeMarinis article, it says it's prejunctional D2
5 receptor agonists.

6 BY MR. BRAHMA:

7 Q Prejunctional, correct?

8 A Prejunctional, yes. But I don't see that
9 it says it's not a postjunctional receptor agonist.
10 Well, that would be my observation as I sit here.

11 Q Okay. Well, let's see what you said in
12 Exhibit 133, if we can turn to that. If you look at
13 the first page of Exhibit 133.

14 A Yes.

15 Q Do you see the paragraph that starts "To
16 clarify the point"?

17 A Yes.

18 Q So it says, "To clarify the point raised
19 with respect to the prior art compound bromocriptine,
20 there is an error in the description and is correct
21 to state that bromocriptine is a prejunctional D2
22 receptor agonist."